

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. 08- |
| v. | : | DATE FILED: |
| TERRENCE B. FLETCHER | : | VIOLATIONS: |
| | : | 18 U.S.C. § 371 (conspiracy to commit |
| | : | carjacking - 1 count) |
| | : | 18 U.S.C. § 2119 (carjacking - 1 count) |
| | : | 18 U.S.C. § 924(c)(1)(A) (use of a firearm |
| | : | in furtherance of a crime of violence - 1 |
| | : | count) |
| | : | 18 U.S.C. § 2 (aiding and abetting) |
| | : | Notice of forfeiture |

INDICTMENT

COUNT ONE

(CARJACKING CONSPIRACY)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. F.Z. was in lawful possession of a 2004 Mercury Monterey, vehicle identification number ("VIN") 1B3HD56T3RF322651.
2. On or about July 30, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERRENCE B. FLETCHER

conspired and agreed, with persons unknown to the grand jury, to take from the person and presence of another, by force, violence, and intimidation, with intent to cause death and serious bodily harm, a motor vehicle, that is, a 2004 Mercury Monterey, VIN 1B3HD56T3RF322651, that has been transported, shipped and received in interstate commerce.

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendant **TERRENCE B. FLETCHER** and persons unknown to the grand jury (“conspirator #1 and conspirator #2”) planned to carjack F.Z.’s car, and to steal F.Z.’s money and personal property at gunpoint.

4. Defendant **TERRENCE B. FLETCHER** and conspirator #1 carjacked F.Z. at gunpoint, and used F.Z.’s ATM card to make withdrawals from two separate ATMs from which they stole approximately \$762 in cash from F.Z.’s bank account with her ATM card and personal identification number.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant **TERRENCE B. FLETCHER** and the conspirator committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about July 30, 2007:

1. Defendants **TERRENCE B. FLETCHER** and conspirator #1 approached F.Z. as she was walking to her 2004 Mercury Monterey vehicle in the parking lot of the Home Depot at 1651 S. Columbus Boulevard, in Philadelphia, pointed a gun at her, and forced her into the rear passenger area of her vehicle. F.Z. was told to keep her head down or she would be killed.

2. Defendant **TERRENCE B. FLETCHER** entered the driver’s seat of F.Z.’s vehicle and commandeered the vehicle out of the Home Depot parking lot.

3. Conspirator #1 entered the rear of F.Z.'s vehicle, ordered F.Z. to crouch with her head down, and held a gun at F.Z.'s head.

4. Defendant **TERRENCE B. FLETCHER** and conspirator #1 stole F.Z.'s personal property, including her ATM card, and ordered her to provide them with her personal identification number, which she did.

5. Defendant **TERRENCE B. FLETCHER** communicated with conspirator #2, who pulled up to the side of F.Z.'s vehicle, and advised conspirator #2 that they had F.Z. in the back of the car. Defendant **FLETCHER** told conspirator #2 to follow F.Z.'s vehicle to an ATM located on Allegheny Avenue, in Philadelphia, PA.

6. At approximately 10:43 p.m., defendant **TERRENCE B. FLETCHER** exited the carjacked vehicle and used F.Z.'s ATM card at an ATM located at 105 E. Allegheny Avenue, in Philadelphia to make two withdrawals totaling \$342 from F.Z.'s bank account while conspirator #1 held a gun to F.Z.'s head.

7. Defendant **TERRENCE B. FLETCHER** and conspirator #1 drove F.Z. in her carjacked vehicle to the 3100 block of North Lee Street. Defendant **TERRENCE B. FLETCHER** and conspirator #1 exited F.Z.'s carjacked vehicle with F.Z.'s ATM card and cell phone and told F.Z. to stay in the vehicle with her head down or an unidentified man located behind F.Z.'s vehicle would blow her head off.

8. At approximately 10:59 p.m., defendant **TERRENCE B. FLETCHER** and conspirator #1 used F.Z.'s stolen ATM card at an ATM located at 1630 Lehigh Avenue, in Philadelphia to make three withdrawals totaling \$420 from F.Z.'s bank account.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(CARJACKING)

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERRENCE B. FLETCHER,

with intent to cause death and serious bodily harm, at gun point, took, and aided and abetted, and willfully caused the taking of, a motor vehicle, that is, a 2004 Mercury Monterey, vehicle identification number (“VIN”) 1B3HD56T3RF322651, from the person and presence of another, that is, F.Z., by force, violence, and intimidation, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT THREE

(USE OF A FIREARM IN FURTHERANCE OF A CRIME OF VIOLENCE)

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERRENCE B. FLETCHER

knowingly possessed a firearm, and aided and abetted the possession of a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to commit carjacking and carjacking, in violation of Title 18, United States Code, Sections 371 and 2119, as charged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
ACTING UNITED STATES ATTORNEY